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January 28, 2000

EXECUTIVE SECRETARY

Mr. K. David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

**RE: Petition of The Tennessee Small Local Exchange Company  
Coalition for Temporary Suspension of 47 U.S.C. § 251(b) and  
251(c) Pursuant To 47 U.S.C. § 251(f) and 47 U.S.C. § 253(b).  
Docket No. 99-00613**

Dear Mr. Waddell:

Enclosed please find the original and thirteen copies of Petitioner's Requests for Data and Production of Documents to Interveners for consideration in this matter.

If you have any questions or comments, do not hesitate to call me.

Very truly yours,



R. Dale Grimes

RDG\jm

enclosures

cc: Richard Collier, Esq.  
Mr. Terry Wales  
Mr. Clay Bailey  
Ms. Louise Brown  
Mr. David Espinoza  
Mr. John D. Feehan  
Mr. Tommy Ott  
Mr. Herbert Bivens  
Mr. Henry Walker  
Mr. Jim Lamoureux

**FILE**

BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE

100 JAN 31 AM 8 46

RECEIVED SECRETARY

IN RE:

PETITION OF THE TENNESSEE SMALL LOCAL )  
EXCHANGE COMPANY COALITION FOR )  
TEMPORARY SUSPENSION OF 47 U.S.C. § ) DOCKET NO. 99-00613  
251(b) AND 251(c) PURSUANT TO 47 U.S.C. § )  
251(f) AND 47 U.S.C. § 253(b). )

**PETITIONER'S REQUESTS FOR DATA  
AND PRODUCTION OF DOCUMENTS TO INTERVENERS**

TO: US LEC  
Southeast Competitive Carriers Association ("SECCA")  
Hyperion of Tennessee, LP ("Hyperion")  
c/o Henry M. Walker, Esquire  
Boult, Cummings, et al.  
414 Union St., #1600  
Nashville, TN 37219

AT&T Communications of the South Central States, Inc. ("AT&T")  
c/o James P. Lamoureux  
1200 Peachtree St., NE, #4068  
Atlanta, GA 30367

cc: Richard Collier, General Counsel  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

Petitioners, The Tennessee Small Local Exchange Company Coalition, submit the following requests for data and production of documents to interveners and request that, pursuant to the Pre-Hearing Conference, all responses be submitted to Petitioners within 15 days.

**FILE**

## **I. DEFINITIONS**

**a.** The term "Petitioners" shall refer to the Tennessee Small Local Exchange Company Coalition and shall include each of the operating companies certificated to perform service in Tennessee who have joined the coalition.

**b.** The term "your company" shall refer to the party answering these requests, either US LEC; Hyperion of Tennessee, LP; AT&T Communications of the South Central States, Inc.; or Southeast Competitive Carriers Association ("SECCA"). For purposes of SECCA, the term "your company" also includes all members of SECCA, including any associations who are members of SECCA along with the members of any such associations.

## **II. DATA REQUESTS**

**REQUEST NO. 1.** Please provide information pertaining to the size of your company, including but not limited to, your company's annual revenues, assets, number of customers, number of access lines serviced, and the geographic areas of your operations.

**Response:**

**REQUEST NO. 2.** Please identify the name and headquarters address of your corporate parent, your subsidiaries, and all of your corporate affiliates. For each of these entities, please provide the same information requested in Data Request No. 1.

**Response:**

**REQUEST NO. 3.** Please list every entry your company has made into any market since 1996. Please identify, on an annual basis, the geographic area of each market, the date of your entry, who was the incumbent local exchange carrier, the respective percentages of residential and business customers you obtained for each of those markets, and the respective revenues you have received from residential and business customers in those markets.

**Response:**

**REQUEST NO. 4.** Please identify any markets you have made plans to enter in the next five years. For each of those markets, state any projections you have made concerning your anticipated customer base, including the percentage of residential and business customers you project and the projected revenues from each.

**Response:**

**REQUEST NO. 5.** How does your company intend to provide services in the territories of the Petitioners (for example, resale, facilities bypass, and/or purchasing of UNE's) during the first calendar year? In subsequent calendar years? Please include a detailed discussion on the type of services your company intends to provide in Petitioners' exchanges over the next five years including whether service will be provided to both residential and business customers.

- a. Please provide the estimated costs that your company intends to incur by providing these services in Petitioners' exchanges. Separately identify both costs capitalized and expensed.
- b. Will your company install a switch or switches in Petitioners' exchanges? Please provide number, type and cut over dates.
- c. Does your company intend to provide any enhancements to the services it purchases from Petitioners? If so, please describe in detail the enhancements it intends to provide in the first calendar year and subsequent four years? Please respond with specifics for each of the five years.
- d. In which specific municipalities does your company intend to offer service in each of Petitioners' exchanges in the first calendar year and subsequent four years? Please respond with specifics for each of the five years.
- e. What type of interconnection is your company requesting from the Petitioners and at what specific points within the Petitioners' network are you seeking interconnection?

**Response:**

**REQUEST NO. 6.** Please provide a detailed 5 year plan as to how many access lines your company expects to obtain from competing in Petitioners' exchanges using a facility-based basis, how many using a combination of CLEC and ILEC facilities through the purchase of UNE's and how many on a resale basis by completing each of the blank cells in the following table. Please

provide detailed demand forecasts used to arrive at these projected figures including any associated spreadsheets (in MS Excel format), assumptions and rationale, and/or econometric models.

**Response:**

Year	Access Line provided by 100% CLEC Facility-based services to business customers	Access Line provided by 100% CLEC Facility-based services to residential customers	Access Line provided through purchase of UNE's (combination of CLEC and ILEC Facilities) to business customers	Access Line provided through purchase of UNE's (combination of CLEC and ILEC Facilities) to residential customers	Access Line provided by Resale to Business Customers	Access Line provided by Resale to Residential Customers
1						
2						
3						
4						
5						

**REQUEST NO. 7:** Similar to the question above, please provide a detailed 5 year plan as to how much revenue your company expects to generate from competing in Petitioners' exchanges using a facility-based basis, how much using a combination of ILEC and CLEC facilities through the purchase of UNE's, and how much using a resale basis by completing each of the blank cells in the following table. Please provide detailed demand forecasts used to arrive at these projected figures including any associated spreadsheets (in MS Excel format), assumptions (such as resale discount rate and price for unbundled loops) and rationale, and/or econometric models.

**Response:**

Year	Revenue generated by 100% CLEC Facility-based services to business customers	Revenue generated by 100% CLEC Facility-based services to residential customers	Revenue generated through purchase of UNE's (combination of CLEC and ILEC Facilities) to business customers	Revenue generated by services through purchase of UNE's (combination of CLEC and ILEC Facilities) to residential customers	Revenue generated by Resale to Business Customers	Revenue generated by Resale to Residential Customers
1						
2						
3						
4						
5						

**REQUEST NO. 8.** Have you conducted or are you aware of any evidence, forecasts, reports, analysis or studies of the economic impact of your entry into any of the markets serviced by rural carriers would be on customers in Tennessee or in other states and/or on universal service in Tennessee or in other states? If so, please detail the results of that analysis.

**Response:**

**REQUEST NO. 9.** Upon entry into Petitioners' markets, what specific services do you intend to offer and what do you forecast your rates will be for those services for businesses and residential customers?

**Response:**

**REQUEST NO. 10.** Do you have or are you aware of any evidence, forecasts, reports, analysis, or studies as to the economic impact your entry into markets serviced by rural carriers would have or has had on the rural carriers in Tennessee or other states? If so, please describe what information you possess.

**Response:**

## **II. REQUEST FOR PRODUCTION OF DOCUMENTS**

**REQUEST NO. 1.** Please provide a copy of your latest annual report and your latest quarterly report filed with the SEC for your or your parent company.

**Response:**

**REQUEST NO. 2.** Please produce any and all documents you have referred to in preparing answers to these data requests.

**Response:**

**REQUEST NO. 3.** Please produce any business plans or reports you have prepared pertaining to your actual or potential entry into any of Petitioners' or any other rural carriers' markets.

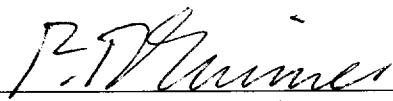
**Response:**



**REQUEST NO. 4.** Please produce any and all reports or documents your company has filed since 1996 with the Tennessee Regulatory Authority pertaining to tariffs, wire line activity, or any information concerning rates.

**Response:**

Respectfully submitted,

  
\_\_\_\_\_  
R. Dale Grimes (#6223)  
T. G. Pappas (#2703)  
BASS, BERRY & SIMS PLC  
2700 First American Center  
Nashville, TN 37238  
(615) 742-6200  
*Counsel for The Tennessee Small  
Local Exchange Company Coalition*

## CERTIFICATE OF SERVICE

I hereby certify that on January 28, 2000, a copy of the foregoing Petitioner's List of Issues was served on the following persons, via U. S. Mail, postage pre-paid, addressed as follows:

Don Baltimore, Esquire  
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Richard Smith, President  
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Phoenix Network  
Attn: Denise Newman  
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Golden, CO 80401

Jane Walters, Commissioner  
Department of Education  
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Nashville, TN 37423-0375

Jack McFadden, Director  
Dept. of Finance & Administration  
598 James Robertson Parkway  
Nashville, TN 37243-0560

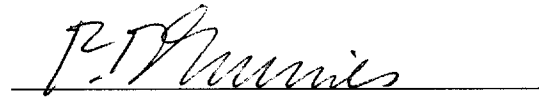
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A handwritten signature in cursive script, appearing to read "R. T. Morris", is written over a horizontal line.

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